

**REMARKS**

**Interview Summary**

Applicants wish to thank Examiner Proctor for the telephone interview conducted on June 22, 2011 with Richard Hanna. During the interview, Sebastian (US Patent No. 5,552,995), as applied to the claims, was discussed. Specifically, it was discussed that Sebastian does not disclose or suggest “sequentially reproducing . . . selected unit work history data one by one in accordance with . . . user approval for each . . . work history datum,” as recited in amended independent claim 1. Additionally, it was discussed that Sebastian does not disclose or suggest “creat[ing] a corresponding surface group in accordance with user input of a correspondence between [a] first reference surface and [a] second reference surface,” as recited in amended independent claim 1. Independent claims 2, 7, 9, 11-15, 17-20, and 22 have been amended to include similar recitations.

**Response to Office Action**

Claims 1, 2, and 5-22 remain pending in this application. By this amendment, Applicants have amended claims 1, 2, 7, 9, 11-15, 17-20, and 22. The amendments to claims 1, 2, 7, 9, 11-15, 17-20, and 22 are supported in the originally filed application, e.g., in the as-filed specification at page 18, lines 3-18, and page 27, line 25 - page 30, line 19. No new matter has been added.

Applicants respectfully request reconsideration and withdrawal of the 35 U.S.C. §103(a) rejection of claims 1, 2, and 5-21 over Sebastian (US Patent No. 5,552,995) in view of Shebini (US Patent No. 4,858,146), and “Repairing CAD Models” by Gill Barequet et al. (“Barequet”). The Office Action asserts that Sebastian, Shebini, and

Barequet disclose all of the features of independent claims 1, 2, 7, 9, 11-15, and 17-20, and furthermore that it would have been obvious to a person of ordinary skill in the art to combine these references. However, as discussed during the Interview of June 22, 2011, the cited references, taken alone or in combination, do not disclose all of the features of amended independent claims 1, 2, 7, 9, 11-15, and 17-20, including, e.g., at least 1) "sequentially reproducing . . . selected unit work history data one by one in accordance with . . . user approval for each . . . work history datum," and 2) "creat[ing] a corresponding surface group in accordance with user input of a correspondence between [a] first reference surface and [a] second reference surface," as recited in claim 1.

The Office Action, at page 5, cites Sebastian at column 23, lines 9-22, as purportedly disclosing that "the selected individual work history data ("feature templates") are sequentially reproduced, one by one (i.e. processing a "macro feature templates"). Sebastian, however, at column 23, lines 9-22, discloses the creation of a macro-feature template from multiple feature templates, wherein each feature template represents a sub-part. In Sebastian, as disclosed in column 21, line 10, through column 22, line 1, the feature templates, each of which represents multiple work steps, are each added to the macro-feature template as a whole unit. In contrast, amended claim 1 recites "sequentially reproducing the selected unit work history data one by one in accordance with an inputted user approval for each input work history datum." As discussed in the Interview, Sebastian does not disclose or suggest user approval for each input work history datum. Shebini and Barequet also do not disclose or suggest

this feature. Amended independent claims 2, 7, 9, 11-15, and 17-20 recite similar features, which are also not disclosed or suggested by the cited references.

The Office Action asserts, at page 5, that the assembly of feature templates into macro-feature templates, as taught by Sebastian, e.g. at column 12, lines 3-25, and column 23, lines 9-22, corresponds with "creat[ing] a corresponding surface group in accordance with user input," as recited by claim 1. Specifically, during the Interview, the Examiner asserted that adjoining surfaces of feature templates to be combined in Sebastian correspond to the claimed "corresponding surface group." Applicants respectfully disagree with this interpretation of the reference. Amended claim 1 recites "creat[ing] a corresponding surface group in accordance with user input of a correspondence between [a] first reference surface and [a] second reference surface." Sebastian does not disclose or suggest a correspondence between a first reference surface and a second reference surface, as these surfaces are defined by the claim.

Amended claim 1 recites "a database which divides a history of design work for creating a shape model, comprising a first reference surface," and "a control section configured to. . . combine the at least two selected unit work history data and output design work data for creating a combined shape model, comprising a second reference surface." Thus, the user input correspondence is created between a first reference surface of a shape model from which a work history has been built, and a second reference of a combined shape model which has been built from the work history. As described in the instant specification at page 27, line 25 - page 30, line 19, in at least some exemplary embodiments, the correspondence between a first surface of a model from which the work history was drawn and a second surface of a model which was built

from the work history, permits a control section to determine, using the corresponding surface group, errors in the combined shape model arising from the second reference surface.

Sebastian, therefore, as discussed during the Interview, does not disclose or suggest "creat[ing] a corresponding surface group in accordance with user input of a correspondence between [a] first reference surface and [a] second reference surface," as recited by amended independent claim 1 and similarly by amended independent claims 2, 7, 9, 11-15, 17-20. Shebini and Barequet also do not disclose or suggest these features.

Because the cited references, taken alone or in combination, do not disclose all of the features recited in the independent claims 1, 2, 7, 9, 11-15, 17-20, these independent claims should be allowable. Claims 5, 6, 8, 10, 16, and 21 variously depend from the independent claims, and are also allowable for at least the same reasons.

Applicants also respectfully request reconsideration and withdrawal of the 35 U.S.C. §103(a) rejection of claim 22 over Sebastian in view of Barequet. Amended independent claim 22 includes recitations similar to those discussed above in connection with independent claims 1, 2, 7, 9, 11-15, 17-20, and is therefore allowable over the cited references for at least the same reasons.

In view of the foregoing amendments and remarks, Applicants submit that the pending claims are allowable. Applicants therefore request the Examiner's reconsideration of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge  
any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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